



■ 260 North San Antonio Road., Suite B ■ Santa Barbara, CA ■ 93110
■ Phone: 805/961-8900 ■ Fax: 805/961-8901 ■ www.sbcag.org

December 16, 2016

Mary D. Nichols
Board Chair
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: Comments on Draft 2030 Target Scoping Plan

Dear Chair Nichols:

Thank you for the opportunity to comment on the California Air Resources Board's (ARB) Draft 2030 Target Scoping Plan. As the Metropolitan Planning Organization and Regional Transportation Planning Agency for Santa Barbara County, the Santa Barbara County Association of Governments (SBCAG) offers the following comments:

1. Limitations of SB 375 Sustainable Communities Strategies

SBCAG appreciates the draft Scoping Plan's recognition of the limitations of Sustainable Communities Strategies in reducing vehicle miles traveled (VMT) and emissions. It makes clear that "VMT reductions are necessary to achieve the 2030 target and must be part of any strategy," but it also notes that, while helpful, "[s]tronger SB 375 GHG reduction targets . . . alone will not provide all of the VMT growth reductions that will be needed" and that "there is a gap between what SB 375 can provide and what is needed to meet the State's 2030 and 2050 goals." (p. 50) It looks to "other potential actions that can be taken in parallel to SB 375 Sustainable Communities Strategies" to close that gap, especially actions at the State level such as the CEQA transportation impact metric mandated by SB 743. The draft Scoping Plan alludes to other State-level strategies under development that may help "to close the VMT gap," which will be specified in more detail in the "Potential VMT Reduction Strategies for Discussion" document to be released in early 2017.

As we commented in connection with ARB's Concept Paper, it is important to recognize the inherent limitations on what reductions can be achieved by the implementation of locally adopted SCSs. SBCAG's modeling work to date indicates that, while SCSs can achieve significant per capita reductions in GHG emissions from passenger vehicles, they do not result in reductions in absolute terms. In the face of population growth (and controlling for technology-driven emission reduction measures), even the most ambitious land use and transportation scenarios result only in reducing the rate of growth of GHG emissions.

2. Quantification of Emissions Reductions

More precise quantification of expected emissions reductions is desirable, especially as it relates to emissions reductions from strategies to limit VMT. As noted above, the draft Scoping

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Plan acknowledges a "VMT gap" not addressable by SB 375 alone. Under "Known Commitments," the draft Scoping Plan also references the Mobile Source Strategy's ambitious VMT reduction goal of 15% by 2050, noting that "measures to achieve this goal [are] not specified." (p.54) The Scoping Plan should more precisely estimate and quantify the expected emission reductions of each separate strategy and subcomponent that will contribute to stated reduction goals.

In particular, the Scoping Plan should seek to quantify overall reductions expected to be achieved through SB 375 implementation. As currently drafted, the Scoping Plan refers to "increased stringency" of SB 375 SCS emission reduction targets for 2035 (p. 84), but this term is vague. Greater clarity is needed to understand how SB 375 implementation will contribute to achieving Scoping Plan goals. Quantifying expected reductions from SCSs will illuminate how Sustainable Community Strategies under SB 375 align with the State's GHG reduction goals, especially the SB 32 2030 goal of 40% below 1990 levels, and how SCSs can demonstrate consistency toward these goals.

Given the backdrop of projected population growth, a VMT reduction of 15% in absolute (as opposed to per capita) terms will be very difficult to achieve absent robust new measures such as road user charge pricing mechanisms. The draft Scoping Plan should address pricing mechanisms, such as the road user charge currently being studied through the Senate Bill 1077 pilot program, more explicitly and in more detail. This treatment should be consistent with the California Transportation Plan (CTP) 2040, which relies on road user charge pricing mechanisms as a means to limit emissions and meet State climate goals.

3. Consistent Nomenclature

The discussion of the three scenarios considered by the Scoping Plan (Draft 2030 Target Scoping Plan Scenario, Alternative 1 No Cap and Trade, and Alternative 2 Carbon Tax) should use consistent nomenclature in discussing the scenarios. The draft text seems to use the terms "scenario," "alternative" and "option" interchangeably, which is not always clear.

Thank you again for the opportunity to comment. Please contact me at (805) 961-8910 with any questions.

Sincerely,



Peter Imhof
Deputy Executive Director

cc: File (SP 30-09-09)
Richard Corey, Executive Officer, ARB
Bill Higgins, Executive Director, CALCOG